

QA: QA

**U.S. DEPARTMENT OF ENERGY
OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
OFFICE OF QUALITY ASSURANCE**

**REPORT FOR AUDIT OCRWMC-BSC-04-18
OF THE OFFICE OF REPOSITORY DEVELOPMENT
AND BECHTEL SAIC COMPANY, LLC
IN LAS VEGAS, NEVADA**

JULY 26 - AUGUST 4, 2004

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EXECUTIVE SUMMARY

Representatives of the Office of Civilian Radioactive Waste Management (OCRWM) conducted a limited-scope compliance-based audit of the Office of Repository Development (ORD) and Bechtel SAIC Company, LLC (BSC) in Las Vegas, Nevada, from July 26 to August 4, 2004. The audit team examined the implementation of quality assurance (QA) program requirements of Section 19, Assessments, of Revision 1 of Addendum 1, *Integrated Safety Management Quality Assurance Program* (ISMQAP) of DOE/RW-0333P, Revision 14, *Quality Assurance Requirements and Description*. Integrated Safety Management (ISM) is governed by DOE/RW-0523, Revision 1, *Integrated Safety Management Plan* (ISMP); the ISMQAP establishes the minimum QA requirements for performance of work governed by the ISMP. The team examined ORD and BSC assessments performed in the last year to determine if those assessments addressed the implementation of ISMQAP.

The audit team issued two Level B Condition Reports (CRs 3442 and 3443), which document that ORD and BSC, respectively, have not been assessing ISMQAP implementation.

The audit team determined that BSC has performed assessments of the ISMP and that the BSC assessments adequately address the requirements of the ISMP. However, there was no objective evidence that these assessments were planned and implemented to determine the adequacy of the procedures to meet the QA requirements of the ISMQAP.

1.0 INTRODUCTION

Representatives of OCRWM conducted a limited scope compliance-based audit at ORD and BSC offices in Las Vegas, Nevada, from July 26 to August 4, 2004. The audit team examined ORD and BSC assessments performed in the last year to determine if they addressed the QA program requirements of Section 19 of the ISMQAP.

Attachment A lists the personnel contacted during the audit, including meeting attendees. Attachment B lists the objective evidence that the auditors examined.

1.1 PURPOSE AND SCOPE

The audit was conducted to verify compliance to Section 19, Assessments, of the ISMQAP. The scope of the audit was an examination of management assessments, program assessments, independent assessments, self-assessments, and one external assessment performed by ORD and BSC from July 2003 to July 2004 to determine if these assessments evaluated compliance with the QA requirements of the ISMQAP.

1.2 AUDIT TEAM

William J. Glasser	Navarro Quality Services (NQS)/Audit Team Leader
Timothy J. Benoit	NQS/Auditor
William L. Petrie	NQS/Auditor

2.0 AUDIT DETAILS

The pre-audit meeting was held at 8:00 a.m. on July 26, 2004, and the post-audit exit meeting was conducted at 2:00 p.m. on August 4, 2004.

Functions and activities for implementing the ISMP are subject to the quality requirements of the ISMQAP. As defined by Section 19 of the ISMQAP, management assessments and independent assessments are to be performed periodically to assess the performance of OCRWM organizations in order to determine if they meet the ISM requirements, expectations, and mission objectives.

The audit team determined that BSC performed two types of assessments:

- **Self-Assessments**
Beginning March 31, 2004, BSC conducted several management and organizational self-assessments in accordance with LP-QA-005-BSC, Revision 0, ICN 0, *Management Self-Assessments and Organizational Self-Assessments*. This document superseded AP-2.20Q, *Self-Assessments*.
- **Independent Assessments**
BSC conducted one independent assessment in accordance with LP-ESH-029-BSC, Revision 1, ICN 0, *Environmental, Safety, and Health Assessments*.

The audit team determined that ORD performed four types of assessments:

- **Management Assessments**
ORD conducted a QA Management Assessment (QAMA) in accordance with LP-2.5Q-OCRWM, Revision 1, ICN 1, *Management Assessment*. The QAMA was an annual assessment conducted by personnel outside the OCRWM Office of Quality Assurance or the QA organizations of other affected organizations to evaluate the adequacy of resources and personnel provided to achieve the quality, adequacy, and the effectiveness of the QA program.
- **Program Assessments**
ORD conducted program assessments in accordance with LP-QA-001-OCRWM, *Non-Quality Affecting Oversight and Assessments*, or LP-PMC-011-OCRWM, Revision 0, ICN 0, *Program Assessments*, which superseded the former on June 23, 2004. Program assessment is the responsibility of the Office of Performance Management and Improvement/Performance Assessment Team (OPM&I/PAT) and is designed to assess the ISM activities of OCRWM, its direct support contractors, BSC including the national laboratories, the U.S. Geological Survey.

- **Independent Assessments**

ORD conducted independent assessments in accordance with LP-PMC-006-OCRWM, *Independent Assessment*, which is the process for overseeing, scheduling, preparing, performing, and reporting independent assessments within the ORD.

- **Self-Assessments**

ORD conducted self-assessments in accordance with LP-PM-001-OCRWM, *OCRWM Self-Assessment Program*.

An examination of the BSC and ORD assessments performed in the last year determined that they satisfied the requirements of their respective procedures and the requirements of the ISMP. However, none were specifically planned and implemented to address and evaluate compliance with the QA requirements of the ISMQAP. Rather, these assessments addressed compliance of activities to the implementing procedures, ISMP requirements, documents, federal regulations, or other material. As a result, the audit team issued CRs to both ORD and BSC management to document the lack of assessments to determine the adequacy of implementing procedures to meet ISMQAP requirements.

3.0 SUMMARY OF AUDIT RESULTS

3.1 CONDITION REPORTS

Two Level B Condition Reports were issued.

3.1.1 Level B CR 3442– ISMQAP implementation has not been assessed by ORD

Requirements

1. The introduction to the ISMQAP states that the line organizations share responsibility for the verification of quality with organizations that perform independent assessments. It further states that the ISMQAP is the principal QA document for the OCRWM ISM program.
2. Section 19 of the ISMQAP provides for assessments to evaluate if OCRWM organizations meet ISM program requirements.

Condition

Assessments have not been conducted by DOE to determine the adequacy of implementing procedures to meet the ISMQAP requirements.

3.1.2 Level B CR 3443 – ISMQAP implementation has not been assessed by BSC

Requirements

1. The introduction to the ISMQAP states that the line organizations share responsibility for the verification of quality with organizations that perform independent assessments.

2. Section 19 of the ISMQAP provides for assessments to evaluate if OCRWM organizations meet ISM program requirements.
3. BSC's PGM-CRW-AD-000001, Revision 03, *Integrated Safety Management Description Document*, paragraph 5.5.11, states in part that the BSC QA Program is guided by the QARD and recognizes that the ISMQAP is appended to that document for performance of work governed by the OCRWM ISMP.

Condition

Assessments have not been conducted by BSC to determine the adequacy of implementing procedures to meet the ISMQAP requirements.

3.2 PROGRAM ADEQUACY, IMPLEMENTATION, AND EFFECTIVENESS

The audit team determined that BSC has performed assessments of the ISMP and that the BSC and ORD assessments adequately address the requirements of the ISMP. However, there was no objective evidence that these assessments were planned and implemented to address and demonstrate compliance with the QA requirements of the ISMQAP.

The audit team concluded that although assessments are adequate to evaluate procedure compliance, the assessments did not fully comply with the assessment requirements of Section 19 of the ISMQAP. The assessments have not been adequate or effective to determine the adequacy of implementing procedures to meet the ISMQAP requirements.

4.0 ATTACHMENTS

Attachment A - Personnel Contacted
Attachment B - Summary of Objective Evidence

ATTACHMENT A - PERSONNEL CONTACTED

Organization	Name	Audit Planning	Pre-audit Meeting	Contacted During Audit	Post-Audit Meeting
BSC/Assessment Program, Manager	Robert McKay			X	
BSC/Audits Supervisor	Bob Habbe				X
BSC/Independent Assessment Team	Stacy Bourcier			X	
BSC/Independent Assessment Team	Robert Kimble	X	X	X	
BSC/Independent Assessment Team	Ken Wolverton	X	X		X
BSC/Independent Assessments Manager	Sid Dodd	X	X	X	
BSC/QA	William Holub	X		X	
BSC/Quality Verification	Bob Habbe			X	X
BSC/Quality Verification Manager	Robert Hartstern			X	
BSC/Repository Operations Manager	Russ Fray			X	
BSC/Requirements Manager	Walter Anderson			X	
BSC/Self-Assessment Program Coordinator	Ron Berlien	X		X	
BSC/Special Projects	Sam Horton	X	X		
MTS/OFO support	Frank Kratzinger		X		X
OFO/Director	Suzy Mellington			X	X
OFO/Staff	Catherine Hampton	X		X	
OPM&I/PAT Assessment Team	Dave Howell	X		X	X
OPM&I/PAT Manager	Dick Spence	X			X
OQA	Kerry Grooms			X	
OQA/Director	Denny Brown			X	
ORD/Business Support	Birdie Hamilton-Ray			X	
ORD/OBS Contracts	Kathy Clemensen			X	

ATTACHMENT B – SUMMARY OF OBJECTIVE EVIDENCE

DOE P 450.4, *Safety Management System Policy*

DOE G 450.4-1B, *Integrated Safety Management System Guide*

DOE O 414.1B, *Quality Assurance*

DOE/RW-0523, Revision 1, *Integrated Safety Management Plan*

Addendum 1, DOE/RW-0333P, Revision 1, *Integrated Safety Management Quality Assurance Program*

DOE/RW-0333P, Revision 14, *Quality Requirements and Description*

BSC Contract DE-AC28-01RW12101, Subsections H32, I29, and I38, MOD 57, Subsection C2.4A, and MOD 35, Section E, Part 1

PGM-CRW-AD-000001, Revision 1, *Integrated Safety Management Description Document*

LP-ESH-029-BSC, Revision 1, ICN 0, *Environmental, Safety, and Health Assessments*

LP-QA-005-BSC, Revision 0, ICN 0, *Management Self-Assessments and Organizational Self-Assessments* (which superseded AP-2.20Q on March 31, 2004)

LP-2.2Q-OCRWM, Revision 2, ICN 0, *Maintenance of the QARD and the AQAP*

LP-2.5Q-OCRWM, Revision 1, ICN 1, *Management Assessment*

LP-PMC-011-OCRWM, Revision 0, ICN 0, *Program Assessment* (which superseded LP-QA-001-OCRWM on July 23, 2004)

LP-PMC-006-OCRWM, Revision 0/ICN 1, *Independent Assessments*

LP-PM-001-OCRWM, Revision 0/ICN 0, *OCRWM Self-Assessment Program*

ISM Annual Review Reports in accordance with Contract Clause H32 of DE-AC28-01RW12101 in ISM Database for the years 2001, 2002 and 2003

Section 14.0 of the BSC Environmental, Safety & Health (ES&H) Electronic Manual

ES&H Independent Assessments for the year 2003

ES&H self-assessments in BSC Self Assessment Database, July 2003 to July 2004

FY 2003 Quality Assurance Management Assessment of the Office of Civilian Radioactive Waste Management, October 30, 2003

OPM&I/PAT Assessments, July 2003 to July 2004

ORD Self-Assessments, July 2003 to July 2004